

**MADISON COUNTY BOARD OF COMMISS:**

EQC  
July 18, 2012  
Exhibit 12

Commissioners

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July 17, 2012

Pat Flowers, Regional Supervisor  
FW&P Region 3  
1400 S. 19<sup>th</sup>  
Bozeman, Mt 59718

Pat,

I was advised over the weekend that there were two more wolf depredations in Madison County in the last week. I am told there was a confirmed calf kill in Warm Springs late last week and another calf was injured and confirmed to a wolf in the same vicinity of the Ruby in the same timeframe.

Several persons contacted me on Sunday or today to inform me of this action and several others called wondering what we were going to do about it. In our mind, this is no longer a sensitive topic. It has gone on too long and our ranchers and hunters are both taking too much of a loss at the hand of the wolf and a non-responsive FWP agency.

When I talked with the Wildlife Service trapper, Chad Hoover, on Monday, he said that he had been contacted by Mike Ross to inform him that the depredations had occurred. Chad told me that the agency strategy to again take an incremental approach to managing the wolf was chosen and that only two wolves would be taken. I once again find this inappropriate since there were several sitings of four wolves running together in that area.

Today, Tuesday, I was advised of two more calves killed by wolves in the same vicinity. The Wildlife Service's personnel (the trapper) told me today they were likely from the same pack. My question now is: "Is the agency still going to maintain the same nonchalant incremental approach to addressing wolves in this area.

We have had numerous discussions about where the elk numbers are since the wolf has been put back on the landscape. I remain very concerned that the elk is in jeopardy in the Ruby drainage. We hear too many stories of reduced populations and fewer calves from persons that have spent much of their lives in that vicinity. Because of history, we do not trust the local biologist charged with counts.

More importantly, agriculture, our county and valley's backbone, is now struggling with the wolf because the numbers are excessive and the "agency direction" too lax. The above noted incremental approach to addressing depredation is less than a mask to the issue. Livestock producers are not only losing livestock, of which some are found, they are experiencing health problems, generally pneumonia, because the cattle are running for their life from the wolf. They experience lower pregnancy rates, nervous animals and non-typical behavior in their herds. In our mind, there is no doubt it is attributed to the wolf.

In May you and I discussed the agencies direction to addressing depredation. You sent me what I took to be FWP's Region 3 Management Direction to managing wolves. I find it very unusual that the agency is using a departmental "direction" rather than a publicly supported, agency analyzed

policy. With an issue of this priority, we cannot use strategies that are developed in what appears to be behind closed door. This opinion I derived from your August 25, 2011, "Wolf Management" letter to Ken McDonald, Wildlife Bureau Chief.

Considering the above statements and opinion, I will be placing on the Madison County Commission agenda a topic related to this issue. It will be to assure that Madison County Commissioners are involved with FWP and WS in decisions related to management of wolves following depredation. We will be requiring this in relation to language in MCA 87-1-217. As all parts of this statute relate to "policy for management of large predators", we will expect to be immediately informed when any wolf interaction with livestock, pets, or human occurs. We expect to be notified prior to the agency decision of remedy related to any interaction. MCA 87-1-217 states that "the department shall ensure that county commissioners in areas that have identifiable populations of large predators have the opportunity for consultation and coordination with state and federal agencies prior to state and federal policy decisions involving large predators and large game species." In our reading of the act, this refers to being noticed immediately when livestock or pets are killed by wolves and prior to policy decisions by FWP in concert with WS related to management of wolves following a depredation.

Also, we will be communicating with legal council in behalf of clarification of the Region 3 "direction regarding wolf management" letter of August 25, 2011, as it relates to or corresponds with the statute "MCA 87-1-217" and the "Montana Protocol to Address Wolf-Livestock Conflict" document dated March 1, 2010. We believe the legislature was very clear in directing FWP in management of wolves. We are convinced, however, that FWP did not hear that direction or take appropriate steps to implement that intent.

Thank you,



David Schulz, Chair  
Board of Commissioners  
Madison County

Cc: Madison County Attorney  
FWP Director, Joe Maurier  
FWP Commissioner, Dan Vermillion  
Senator Debby Barrett  
EQC Chair, Jim Keane